

Exhibit A

From: [Christopher Geddis](#)
To: [Priselac, Jessica](#); [Goldberg, Seth A.](#); [Adam Slater](#)
Cc: [Schwartz, Barbara](#); [Hill, Coleen W.](#); [Cheryll Calderon](#); [Layne Hilton](#); [George T. Williamson](#)
Subject: RE: ZHP deposition schedule and deposition lengths
Date: Tuesday, January 12, 2021 9:56:00 AM

Jessica,

2 pm ET works for us.

Thanks,
Chris

From: Priselac, Jessica <JPriselac@duanemorris.com>
Sent: Tuesday, January 12, 2021 9:53 AM
To: Christopher Geddis <CGeddis@mazieslater.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>
Cc: Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>; George T. Williamson <gwilliamson@farr.com>
Subject: RE: ZHP deposition schedule and deposition lengths

Chris,

We are available at 2 pm today to continue yesterday's discussion on the deposition schedule. If you are available at that time, please let us know and I will circulate a call-in.

Thanks,

Jessica

Jessica Priselac
Attorney at Law

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Friday, January 8, 2021 5:20 PM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Priselac, Jessica <JPriselac@duanemorris.com>
Cc: Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>; George T. Williamson <gwilliamson@farr.com>

Subject: RE: ZHP deposition schedule and deposition lengths

Seth,

Plaintiffs are available on Monday from 4 p.m. ET onwards. Please advise when you would like to meet and confer.

Best,
Chris

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Sent: Friday, January 8, 2021 3:29 PM

To: Adam Slater <ASlater@mazieslater.com>; Priselac, Jessica <JPriselac@duanemorris.com>

Cc: Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W.

<CWHill@duanemorris.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>; George T. Williamson <gwilliamson@farr.com>

Subject: RE: ZHP deposition schedule and deposition lengths

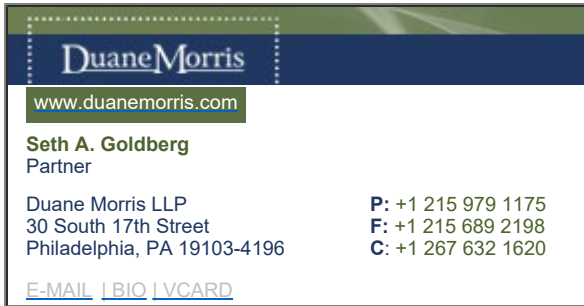
Thanks for your email, Adam. Your proposal of 23.5 days of 30(b)(6) deposition testimony is unacceptable. Based on the topics in your 30(b)(6) notices, our familiarity with the documents that are pertinent to those topics, and through numerous discussions with our client, including the employees we have designated as 30(b)(6) witnesses, about the facts relating to those topics, and given the customary practice in complex litigation like this MDL, the ZHP parties propose 15 hours of 30(b)(6) testimony for the ZHP 30(b)(6) witnesses, collectively, allocated as Plaintiffs see fit, and 5 hours of 30(b)(6) testimony for the employees designated by Huahai US, Princeton, and Solco as 30(b)(6) witnesses, collectively, allocated as Plaintiffs see fit, for a total of 20 hours of 30(b)(6) testimony for the ZHP parties.

Set forth below are the dates the additional witnesses are available. As you know, we object to these depositions and will be moving for a protective order as to each. Our providing the dates below is not, and should not be construed as, an agreement to proceed with any of these depositions, and the ZHP parties and the witnesses explicitly reserve all objections they have to being deposed in this action, including jurisdictional grounds and under the apex deposition doctrine.

First Name	Last Name	Availability
Xiaodi	Guo	March 4 or 5
Eric	Tsai	March 8 or 9
Lucy	Liu	March 10 or 11
Yuelin	Hu	March 16 or 17
Karen	Xu	March 18 or 19
Xavier	Tang	March 24 or 25
Baohua	Chen	April 1

If you would like to meet and confer to discuss the above, please let us know times on Monday or Tuesday that work for you, and we will try to accommodate your schedule.

--Seth



From: Adam Slater <ASlater@mazieslater.com>

Sent: Wednesday, January 6, 2021 4:18 PM

To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>

Cc: Cheryl Calderon <ccalderon@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>; George T. Williamson <gwilliamson@farr.com>

Subject: ZHP deposition schedule and deposition lengths

Hello Counsel:

I am writing to advance our ongoing discussions to set the schedule of the ZHP witness depositions, and arrive at agreed lengths.

Before addressing the deposition schedule, I wanted to confirm for you that we will likely split up a number of the depositions using different questioners to cover different parts of the depositions, so that we can manage to take the massive number of depositions we must undertake over the next few months with regard to ZHP and the other manufacturers. The deposition notices will provide this information with regard to each deposition.

We are still awaiting proposed dates for the witnesses who Judge Schneider recently found to be appropriate, including but not limited to Mr. Chen. It is important for us to know what dates are proposed as we need to consider all depositions in determining whether to agree to the schedule, or discuss proposed modifications.

Second, we have given a great deal of thought to appropriate lengths of the scheduled depositions. The lengths set forth below do not factor in the 75% additional time per the

deposition protocol, which will be added to the lengths once agreed to or ordered.

With regard to witnesses who are only being produced as fact witnesses, and not also as 30 b 6 witnesses, we can agree to conduct those depositions in one day (plus 75% where applicable).

As you insisted that the depositions be split between 30 b 6 deposition topics, and followed by the individual fact witness deposition, we have factored in one day for the fact witness deposition, and then worked to evaluate the number, combination, and nature of 30 b 6 topics assigned to the witness, in order to arrive at a reasonable length of deposition time for the 30 b 6 topics, as follows:

Lijie Wang - 1.5 days

Hai Wang - 2.5 days (You advised that certain categories will be shared with other 30 b 6 deponents, in an email or during our next meet and confer we request that you explain how the topics are being split up for this and other witnesses for whom this applies, so we can factor that in and prepare)

Linda Lin - 2 days

Jie (Jay) Wang - 2 days

Hong (Eric) Gu - 2 days

Jucai Ge - 3 days

Minli Zhang - 3 days

Qiangming Li - 2.5 days

Peng Dong - 2.5 days

Min Li - 2.5 days

Please let us know when you would like to discuss. To the extent you believe any of the proposed deposition lengths to need to be modified, we look forward to discussing your position. Please keep in mind the need to avoid overlapping depositions as well.

Thank you,

Adam Slater

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